

1 TREVOR J. HATFIELD, ESQ  
2 Nevada Bar No. 7373  
3 HATFIELD & ASSOCIATES, LTD.  
4 703 S. Eighth Street  
5 Las Vegas, Nevada 89101  
6 Telephone: (702) 388-4469  
7 Facsimile: (702) 386-9825  
8 Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)

9  
10 *Attorney for Plaintiffs*

11  
12  
13  
14 **UNITED STATES DISTRICT COURT**  
15  
16 **DISTRICT OF NEVADA**

17  
18  
19  
20 ELISEO NAPOLES, MARIE NAPOLES  
21 AND M.N., A MINOR, BY AND  
22 THROUGH HIS GUARDIAN AD LITEM,

23  
24 Plaintiffs,

25 vs.

26  
27 CLARK COUNTY SCHOOL DISTRICT,  
28 DOES I through X, inclusive; ROE  
CORPORATIONS I through X, inclusive

29  
30 Defendant.

31  
32  
33 CASE NO: 2:19-cv-01474-APG-BNW

34  
35  
36  
37 **STIPULATION AND ORDER TO**  
38 **EXTEND DISCOVERY DEADLINES**  
39 **(Second Request)**

40  
41  
42 COMES NOW, Plaintiffs, ELISEO NAPOLES, MARIE NAPOLES AND M.N., A  
43 MINOR, BY AND THROUGH HIS GUARDIAN AD LITEM (hereinafter, "Plaintiffs"), by and  
44 through their counsel, the law firm of Hatfield & Associates, Ltd., and Defendant CLARK  
45 COUNTY SCHOOL DISTRICT (hereinafter "Defendant"), by and through its counsel, Phoebe  
46 V. Redmond, Esq., and Crystal J. Herrera, Esq., of the Clark County School District Office of  
47 the General Counsel, do hereby stipulate and agree to extend the discovery deadlines set forth in  
48 the Stipulation and Order to Extend Discovery Deadlines First Request (ECF #15) sixty (60)  
49 days pursuant to LR IA 6-1 and LR 26-4 for the reasons provided below. This is the parties'  
50 second request for an extension of discovery deadlines.

Discovery closes on August 17, 2020. The last day to file Dispositive Motions is September 16, 2020.

## 1. **DISCOVERY COMPLETED TO DATE:**

A. Plaintiffs served Initial Disclosures on Defendant on January 24, 2020. Defendant served Initial Disclosures on Plaintiffs on January 27, 2020.

B. Plaintiffs provided Defendant with Medical Record Release Authorizations, and Defendant correspondingly served subpoenas for M.N.'s medical records.

C. Plaintiff M.N. served discovery in the form of Interrogatories, Requests for Documents, and Requests for Admissions on May 12, 2020.

D. Defendant served discovery in the form of Interrogatories and Requests for Production of Documents, on June 5, 2020.

## 2. DISCOVERY YET TO BE COMPLETED:

A. Plaintiffs intends to take the depositions of fact and expert witnesses.

B. Defendant intends on receiving M.N.'s medical records which have yet to be produced in response to its subpoenas and to take the depositions of fact and expert witnesses.

3. **REASONS DISCOVERY COULD NOT BE COMPLETED WITHIN THE EXISTING DEADLINE.**

Good cause exists for this extension, as the current coronavirus/COVID-19 pandemic has caused, and continues to cause, disruption to the practices of counsel involved in this case. The parties have been diligent in conducting discovery. Indeed, in-person depositions could not reasonably be scheduled or taken in the last 60 days and the parties agreed to defer written discovery for a period of time due to the pandemic. Plaintiff's medical records are voluminous and have to be updated. Defendant has requested medical records from over thirty medical providers. In order to allow for the parties to complete the remaining discovery provided above,

1 the parties respectfully request that the discovery deadlines in this matter be extended sixty (60)  
 2 days. This is the second request for an extension, which is made in good faith and not for the  
 3 purposes of delay.

4

5 **4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY AND OTHER**  
 6 **DISCOVERY DEADLINES.**

7

8 A. On March 30, 2020, this Court ordered that the last date to complete discovery  
 9 would be August 17, 2020, that the last day to file dispositive motions would be September 16,  
 10 2020, and that the last day to file a pretrial order would be October 16, 2020. The parties  
 11 stipulate and agree to a proposed sixty (60) day stay of discovery plus the following proposed  
 12 rescheduled discovery dates:

13 **Summary of Proposed Changes**

	<b>Current Deadline</b>	<b>Revised Deadline</b>
<b>Close of Discovery</b>	<b>August 17, 2020</b>	<b>October 16, 2020</b>
<b>Interim Status Report</b>	<b>June 18, 2020</b>	<b>Not applicable</b> <b>(LR 26-3 deleted)</b>
<b>Disclosure of Experts and Expert Reports</b>	<b>June 18, 2020</b>	<b>August 17, 2020</b>
<b>Disclosure of Rebuttal Experts and their reports</b>	<b>July 17, 2020</b>	<b>September 16, 2020</b>
<b>Dispositive Motions</b>	<b>September 16, 2020</b>	<b>November 16, 2020</b>
<b>Pretrial Order</b>	<b>October 16, 2020</b>	<b>December 16, 2020</b> <b>(If dispositive motions are filed, 30 days after the entry of the court's ruling on said motion)</b>

27     ///

28     ///

1  
2 **IT IS SO STIPULATED.**

3 Dated: June 5, 2020

4 HATFIELD & ASSOCIATES, LTD.

5 */s/ Trevor J. Hatfield*

6 By: \_\_\_\_\_

7 TREVOR J. HATFIELD

8 Nevada Bar No. 7373

9 703 South Eighth Street

10 Las Vegas, Nevada 89101

11 (702) 388-4469 Tel.

12 (702) 386-9825 Fax

13 Email:[thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)

14 Attorney for Plaintiff

Dated: June 5, 2020

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL

15 */s/ Crystal J. Herrera*

16 By: \_\_\_\_\_

17 PHOEBE V. REDMOND, ESQ.

18 Nevada Bar No. 9657

19 CRYSTAL J. HERRERA, ESQ.

20 Nevada Bar No. 12396

21 5100 West Sahara Avenue

22 Las Vegas, Nevada 89146

23 Tel: (702) 799-5373

24 Fax: (702) 799-5505

25 Email: [redmopy@nv.ccsd.net](mailto:redmopy@nv.ccsd.net)

26 Email: [herrec4@nv.ccsd.net](mailto:herrec4@nv.ccsd.net)

27 Attorneys for Clark County School District

28 HATFIELD & ASSOCIATES, LTD.  
703 8<sup>th</sup> Street \* Las Vegas, Nevada 89101  
Telephone (702) 388-4469

18 **IT IS SO ORDERED.**

19 DATED this 8th day of June , 2020.

20   
21 \_\_\_\_\_  
22 UNITED STATES MAGISTRATE JUDGE.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 5<sup>th</sup> day of June, 2020, I filed and served the foregoing  
**STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (Second Request)**  
with the Clerk of the Court using the ECF system which served the parties hereto electronically.  
DATED: June 5, 2020  
/s/ *Freda P. Brazier*

DATED: June 5, 2020

/s/ *Freda P. Brazier*

By:

An employee of Hatfield & Associates, Ltd.

**HATFIELD & ASSOCIATES, LTD.**  
703 8<sup>th</sup> Street \* Las Vegas, Nevada 89101  
Telephone (702) 388-4469